



SYLVIA HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

**DONNA A. CANFIELD**  
Assistant Corporation Counsel  
Phone: (212) 356-2461  
Fax: (212) 356-2438  
dcanfiel@law.nyc.gov

March 7, 2022

**BY: ECF**

Honorable John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1320  
New York, New York 10007

Re: *Kaye v. NYC Health & Hospitals Corp. et al.*, 18-cv-12137 (JPC)(JLC)

Dear Judge Cronan:

I am an Assistant Corporation Counsel in the office of Sylvia Hinds-Radix, Corporation Counsel of the City of New York, attorney for defendants the New York City Health and Hospitals Corporation ("H+H"), Elizabeth Ford, Patricia Yang, Abhishek Jain, and Jonathan Wangel, in the above-referenced matter. Due to problems uploading the numerous exhibits in this case on ECF, I write to respectfully request that Defendants motion for summary judgment, filed in its entirety at 5:24 a.m. on March 5, 2022, be considered as filed *nunc pro tunc*, on March 4, 2022.

Defendants thank the Court in advance for its consideration of this request.

The request is granted.

SO ORDERED.

Date: March 7, 2022

New York, New York

JOHN P. CRONAN  
United States District Judge

Respectfully submitted,

ECF /s/

Donna A. Canfield  
Assistant Corporation Counsel  
dcanfiel@law.nyc.gov

cc: Special Hagan (by ECF)